

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Jennifer A. Lis	:	Chapter 13
	:	No.: 20-12224-AMC
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY WELLS FARGO BANK, NA.

Debtor, Jennifer A. Lis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Wells Fargo Bank, N.A., hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted payments were missed. Debtor requests the chance to catch up.
10. Admitted.
11. Admitted.
12. Admitted payments were missed. Debtor requests opportunity to include post-petition arrears in a Modified Plan.
13. Debtor requests opportunity to include all post-petition arrears in a Modified Plan.

14. Denied. Debtor requests chance to catch up.
15. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: March 23, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Sarah A. Barngrover
Electronic Notice
Attorney for Movant

Dated: March 23, 2021

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107